5. REMEDIAL ACTION WORK PLAN

Implementation of the remedial design, remedial action work tasks, and supporting documents will be completed as described in the following sections.

5.1 Implementation of the Remedial Design

5.1.1 Relevant Changes to the Scope of Work

Based on Post-ROD sampling at WRRTF-13, and a Tier 2 State of Idaho RBCA evaluation, no remedial action is required at WRRTF-13 as identified in Sections 1.2.4 and 1.3.1.4, and presented in detail in Appendix F.

The construction completion report as discussed in the scope of work has been renamed the final inspection report to be more consistent with the FFA/CO and RD/RA guidance terminology.

5.1.2 Subcontracting Plan

The work contained in this work plan is primarily earthwork and includes an evaluation for excavating, hauling, and placement of borrow materials to the project site. The specific tasks that will be performed to complete this work are described in Section 5.2.

The work, in total or in part, may be competitively bid and a contract awarded to the company providing best value to the project. The bid process will include the request for proposal (RFP), prebid conference, private or public bid opening, bid evaluation, notice of award, notice to proceed, and preconstruction conference.

5.1.3 Field Oversight/Construction Management

The DOE-ID remediation project manager will be responsible for notifying the EPA and the IDEQ of project activities. The project manager will also serve as the single interface point for all routine contact between the Agencies, the INEEL M&O contractor, and the subcontractor.

The INEEL M&O contractor will provide field oversight and construction management services for this project. The INEEL M&O contractor will also provide field support services for health and safety, environmental, quality assurance, and landlord services. An organization chart and position description is provided in the project HASP (INEEL 2000a).

5.1.3.1 Protocol and Coordination of Field Oversight. The DOE will notify the EPA and IDEQ WAG managers of pending remedial action activities, such as project start-up, close-out and inspections. Activities related to preliminary inspections, the prefinal inspection, and the final inspection are covered in Section 5.3. In accordance with the FFA/CO, a minimum 14 calendar-days notification will be provided prior to prefinal inspection activities.

Visitors to the site who wish to observe activities must meet badging and training requirements necessary to enter INEEL facilities. Training requirements for visitors are described in the project HASP (INEEL 2000a).

5.1.4 Project Cost Estimate

The cost estimates for the three projects addressed by this work plan are presented in Appendix E, Cost Estimate Support Data Tables. The costs will be revised during each submittal of this document to reflect the most current estimate, based on comments to the design and other data.

5.1.5 Project Schedule

The OU 1-10 remedial action working schedule (Figure 5-1) with the associated data identified in Table 5-1 covers all project tasks from the project Scope of Work (DOE-ID 2000e) through completion of the final inspection report. Administrative and document preparation activities are based upon an 8-hour day, 5-day work week, while field activities are based upon a 10-hour day, 4-day work week. The schedule does not include any contingency for delay to the schedule due to late or slow document reviews, or for field activities experiencing loss of productivity due to adverse weather conditions.

5.1.6 Post-ROD Sampling

Post-ROD sampling was conducted at the Soil Contamination Area South of the Turntable (TSF-06, Area B), the PM-2A Tanks (TSF-26), and Fuel Leak site (WRRTF-13), prior to the start of any remedial actions. Analytical results will be used to prepare no-longer contained-in determinations, support hazardous waste determinations, and determine the FRG for the Fuel Leak site. Post-ROD sampling will also be used to determine the final estimation of the depth and areal extent of excavation, and volume of contaminated soil to be removed. Details of post-ROD sampling are in Section 2.9 of this document.

5.2 Remedial Actions Work Tasks

The remedial action work tasks identify the activities that will be performed by a subcontractor to complete the project. It provides a brief task description of the subcontractor's work, plus subcontractor/contractor interfaces. Additional detail is provided in the construction drawings, technical specifications, and the RFP. The work described below may be performed by INEEL labor, issued as a single subcontract, or as several individual subcontracts. The subcontractor may subcontract portions of the work for a more efficient completion of the project.

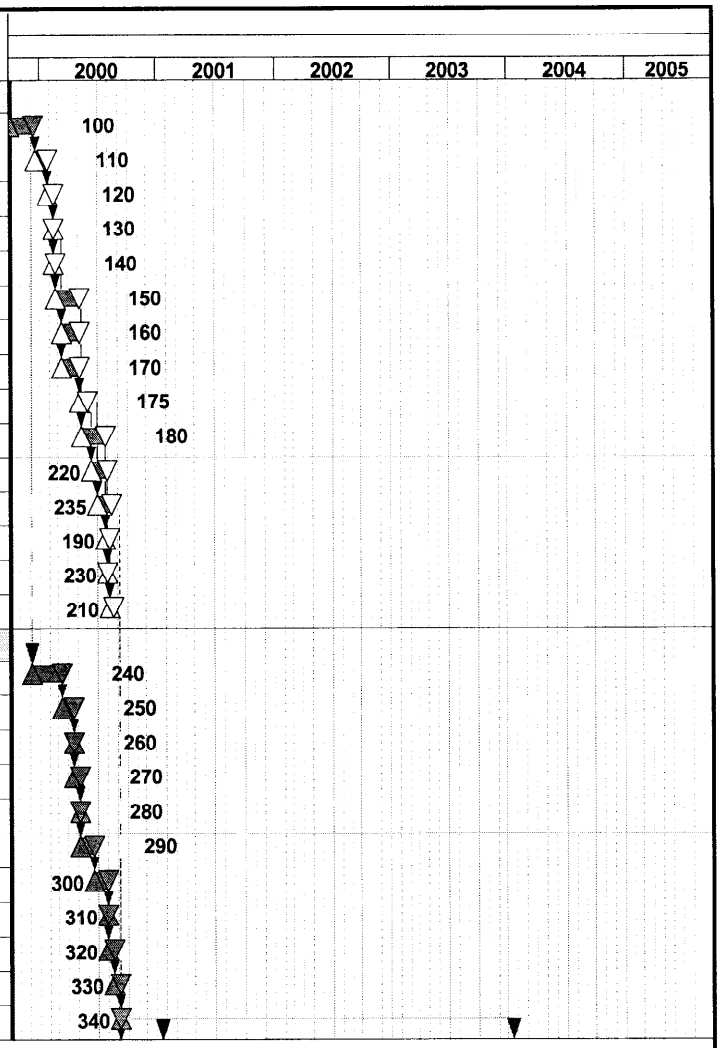
5.2.1 Premobilization

The subcontractor will submit all required submittals, work plans, bonds, and insurance, and ensure that all necessary training and medical examinations are complete as per the HASP (INEEL 2000a). Specific submittals, required training, and current medical information required by the HASP will be provided in the RFP, and must be completed before the subcontractor is allowed to mobilize. These submittals will show and/or certify that the subcontractor can meet and satisfy the requirements of the RFP and the project design.

5.2.2 Mobilization

Mobilization describes work that must be done by the subcontractor in preparation for construction operations. This work is generally the implementation of the required administrative, engineering, and health and safety controls, such as:

Activity ID	Activity Description	Orig Dur	Early Start	Early Finish
Post ROD Sampling and Analysis				
100	Prepare Post ROD Sampling & Analysis Plan (SAP)	50	01OCT99*	13DEC99
110	Post ROD SAP Sent to Agencies for Review	20	20DEC99	24JAN00
120	Draft SAP Agency Comment Res. & Incorporation	15	25JAN00	14FEB00
130	Post ROD SAP Becomes Final	1	15FEB00	15FEB00
140	Prepare for Post ROD Sampling Activities	3	16FEB00	18FEB00
150	Perform Sampl. at PM-2A Stock Piles, & WRRTF-13	55	21FEB00	05MAY00
160	Rec. Anal. Data from WRRTF-13 & Perf. RBCA Anal.	40	13MAR00	05MAY00
170	Rec. Anal. Data from PM-2A Stock Piles	40	13MAR00	05MAY00
175	Remove & Bag PM-2A (TSF-26) Stock Piles	16	08MAY00	30MAY00
180	Prepare & Send PM-2A NLCID to IDEQ	51	15MAY00	26JUL00
220	Perform RAD Surveying & Samp. at TSF-06, & PM-2A	38	12JUN00	03AUG00
235	Remove & Bag TSF-06 Overburden	31	03JUL00	15AUG00
190	IDEQ MLCID Concurrence	10	27JUL00	09AUG00
230	Receive Rad Analytical Data from Lab	1	04AUG00	04AUG00
210	Prepare HWDs for Soil at TSF-06 & PM-2A	10	10AUG00	23AUG00
Group 1 RD/RAWP				
240	Prepare Group 1 RD/RA Work Plan	63	07DEC99	10MAR00
250	Draft RD/RA WP DOE-HQ Review & Comm. Inc.	26	13MAR00	17APR00
260	RD/RA WP Table Top Review	1	19APR00	19APR00
270	RD/RAWP Table Top Review Comment Incorporation	10	20APR00	03MAY00
280	Draft RD/RA WP Sent to Agencies for Review	1	04MAY00	04MAY00
290	Draft RD/RA WP Agencies Review	31	05MAY00	19JUN00
300	Draft RD/RA WP Agency Comm. Res. & Incorp.	31	20JUN00	02AUG00
310	Draft Fin. RD/RA WP Sent to Agencies for Concur.	1	03AUG00	03AUG00
320	Draft Final RD/RAWP Agencies Review/Concurrence	11	04AUG00	18AUG00
330	RD/RAWP Finalization	11	21AUG00	05SEP00
340	Group 1 RD/RAWP Becomes Final	1	06SEP00	06SEP00



Start Date 01OCT99
Finish Date 15APR05
Data Date 01OCT99
Run Date 20JUL00 13:56

Early Bar
Progress Bar
Critical Activity

AEJ2 Sheet 1 of 2

Bechtel BWXT Idaho, LLC

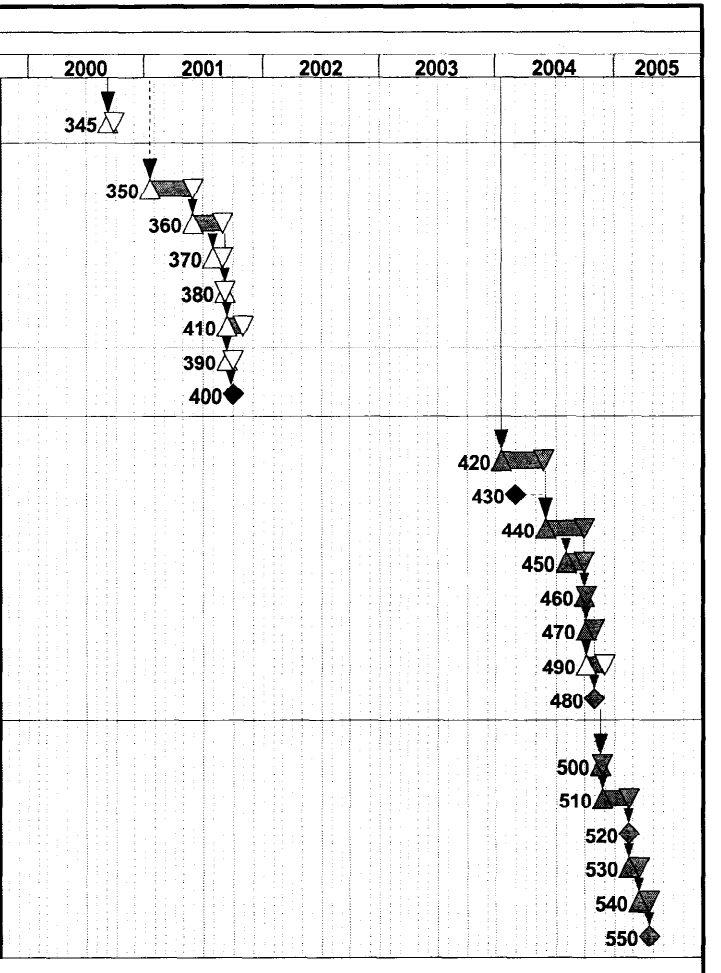
OU1-10 Group 1 Sites RD/RA

Classic Schedule Layout

Date	Revision	Checked	Approved

Figure 5-1. Project schedule.

Activity ID	Activity Description	Orig Dur	Early Start	Early Finish
PM-2A Stockpile & TSF-06 Overburden Disposal				
345	PM-2A/TSF-06 Soil Disposal at RWMC	17	07SEP00	29SEP00
TSF-06 Native Soil Remedial Action				
350	TSF-06 Work Control & Preparations	98	15JAN01*	31MAY01
360	TSF-06 Contaminated Soil Removal & Disposal	65	01JUN01	31AUG01
370	TSF-06 Confirmation Sampling	23	01AUG01	31AUG01
380	TSF-06 Prefinal Inspection	4	04SEP01	07SEP01
410	Site Restoration and Snake Avenue Replacement	38	10SEP01	31OCT01
390	Prepare TSF-06 Prefinal Inspection Report	15	10SEP01	28SEP01
400	TSF-06 Prefinal Insp. Rep. Submitted to Agencies	0		28SEP01
TSF-26 Soil Remedial Action				
420	TSF-26 Work Control & Preparations	97	15JAN04*	28MAY04
430	ICDF Opens	0	27FEB04*	
440	TSF-26 Contaminated Soil Removal & Disposal	86	01JUN04	30SEP04
450	TSF-26 Confirmation Sampling	43	02AUG04	30SEP04
460	TSF-26 Prefinal Inspection	5	01OCT04	07OCT04
470	Prepare TSF-26 Prefinal Inspection Report	16	08OCT04	29OCT04
490	TSF-26 Site Restoration	36	08OCT04	30NOV04
480	TSF-26 Prefinal Insp. Rep. Submitted to Agencies	0		29OCT04
Group 2 Soil Sites (TSF06 &TSF-26) Final Insp.				
500	Group 2 Soil Sites Final Inspection	6	15NOV04	22NOV04
510	Prepare Group 2 Final Inspection Report	52	23NOV04	14FEB05
520	Submit Final Inspection Report to Agencies	0		14FEB05
530	Agency Review Final Inspection Report	21	15FEB05	15MAR05
540	Agency Comm. Res & Inc. to Final Insp. Report	23	16MAR05	15APR05
550	Final Inspection Report Complete	0		15APR05



Start Date 01OCT99
Finish Date 15APR05
Data Date 01OCT99
Run Date 20JUL00 13:56

Early Bar
Progress Bar
Critical Activity

AEJ2 Sheet 2 of 2

Bechtel BWXT Idaho, LLC

OU1-10 Group 1 Sites RD/RA

Classic Schedule Layout

Date	Revision	Checked	Approved

Figure 5-1. (continued).

Table 5-1. Working schedule and enforceable dates for the OU 1-10 Group 1 remedial action.

Activity	Planned Start Date	Planned Completion Date	Enforceable Completion Date
Remedial Design			
Submittal of Draft RD/RA Work Plan to Agencies	5/4/2000	5/4/2000	7/3/2000[a]
Agencies Review of Draft RD/RA Work Plan	5/5/2000	6/19/2000	[b]
Prepare Draft Final RD/RA Work Plan	6/20/2000	8/2/2000	[b]
Agencies Review of Draft Final RD/RA Work Plan	8/3/2000	8/18/2000	[b]
Final RD/RA Work Plan	8/21/2000	9/5/2000	[b]
RD/RA Work Plan Finalized	9/6/2000	9/6/2000	[b]
Post-ROD Sampling			
Begin Post-ROD Sampling to Start Continuous Remedial Activities	2/21/2000		10/31/2000[a]
Submittal of Post-ROD Sampling Limitation and Validation Reports to Agencies		[c]	
Remedial Action			
TSF-06 Native Soil Field Work	6/1/2001	8/31/2001	
TSF-06 Prefinal Inspection	9/4/2001	9/7/2001	
Submit TSF-06 Prefinal Inspection Report		9/28/2001	
INEEL CERCLA Disposal Facility Opens		2/27/2004	
TSF-26 Soil Field Work	6/1/2004	9/30/2004	
Complete Disposal of Surface Soils Generated During Remedial Actions at TSF-06 and TSF-26 (PM-2A).		October 2004	February 2005[a]
TSF-26 Prefinal Inspection	10/1/2004	10/7/2004	
Submit TSF-26 Prefinal Inspection Report		10/29/2004	
Group 1 Final Inspection	11/15/2004	11/22/2004	
Submit Group 1 Final Inspection Report		2/14/2005	
Agency Review of Group 1 Final Inspection Report	2/15/2005	3/15/2005	
Group 1 Final Inspection Report Finalized		4/15/2005	
Five-Year Review	[d]	[d]	

a. Working schedule and enforceable dates are from the OU 1-10 Remedial Design/Remedial Action Scope of Work (DOE-ID 2000e)

b. Review periods consistent with Section 8.13 of the FFA/CO (DOE-ID 1991).

c. Limitation and validation reports will be submitted with the FFA/CO (DOE-ID 1991) required 120 days.

d. The first five-year review is planned for 2005. Specific dates will be determined by the Agencies in the future.

- Fences, signs, and postings
- Identification and demarcation of work areas
- Delivery and storage of material and equipment
- Set-up of the subcontractor site offices.

5.2.3 Borrow, Haul, and Stockpile

Native soil material will be used as backfill for this project. All INEEL native soil borrow sources have been previously determined to be free of contamination.

Borrow operations will be performed in accordance with the project Specifications 02200 (Appendix B) and an approved INEEL Form 1595. The subcontractor will set up an operation at the borrow area to gather and stockpile the material in preparation for hauling it to the project site, and a hauling operation to move the material from the borrow source to the project site where it will be placed.

Equipment used for the hauling and stockpiling operations will remain outside of radiation work areas. The work will require the services of heavy earthwork equipment such as scrapers, dozers, loaders, and large dump trucks, and will require up front planning and coordination with other site operations and personnel to ensure safe and productive hauling across facility roads. The project specifications (Appendix B) identify the subcontractor as having responsibility for maintaining the site haul roads during operations and for returning the haul roads to their original conditions. The RFP will require that the subcontractor prepare a traffic management plan, including documentation of the condition of the haul roads prior to startup of operations.

5.2.4 Storm Water Management and Sediment Control

The project specifications, Specification #02140, Temporary Diversion & Control of Water During Construction (Appendix B), developed for the project that governs the subcontractor, do not require that a storm water pollution prevention plan be developed for this project.

The specifications require that the subcontractor control surface water prior to and throughout the construction operations. Control measures implemented may include berms, swales, ditches, temporary pipes, portable pumps, silt fences, sediment traps, and any other measures approved by the contractor.

5.2.5 Clearing and Grubbing

The subcontractor will clear the sites of shrubs, vegetation, fences, and other debris, as identified in the construction specifications. Disturbance of underlying soils will be minimized during all clearing and grubbing activities, which will be performed in accordance with Specification 02110, presented in Appendix B of this document.

The subcontractor will remove all existing fences, stakes, gates, and signs from the Soil Contamination Area South of the Turntable, Disposal Pond, PM-2A Tanks, and the Fuel Leak site. The debris and signs from the TSF-06 Area B, TSF-07, and TSF-26 sites will be surveyed by radiological control technicians, decontaminated as necessary, and released for disposal in the Central Facilities Area Landfill, if possible. If decontamination cannot be performed, the waste will be managed accordingly. Debris removed from the WRRTF-13 site, if any, will be disposed with excavated contaminated soil.

5.2.6 Construction Activities

The subcontractor will confine construction operations to within the areas that require barrier construction or to areas directed by the contractor. Any areas outside the designated areas that are damaged or disturbed by the subcontractor's operations will be repaired and seeded by the subcontractor in accordance with Specification 02930, Reclamation Seeding and Mulching, provided in Appendix B of this document.

5.2.7 Security and Inspections

The project will provide for security and inspection procedures during all remedial activities to ensure that unauthorized personnel are not allowed access to the site and that site conditions are controlled at all times.

5.2.8 Soil Excavation

Contaminated soils will be excavated to the extent shown on the design drawings in Appendix A. All excavation activities will be performed in accordance with Specification 02222, Appendix B, of this document.

Precautions such as water spray, wind monitoring, and visual observation will be used to prevent the generation of fugitive dust. Air monitoring requirements will be specified by a radiation control engineer and a certified industrial hygienist. This will be based on monitoring and on the evaluation of the effectiveness of the dust suppression measures to control the spread of contamination through fugitive dust. Personal protective equipment, when required, will be used as specified in the HASP (INEEL 2000a), and as determined by the safety officer and/or the certified industrial hygienist present at the job site. Equipment necessary for excavation of the contaminated soils will remain within the contamination control zones until completion of excavation activities. Equipment that will be used to haul excavated soil from the area will not be driven onto contaminated areas. This will be done in order to minimize the spread of contamination and to obviate the need to perform any additional decontamination.

5.2.9 Waste Management

The remedial actions planned at Test Area North under the OU 1-10 Record of Decision and this RD/RAWP will generate secondary waste, including industrial, low-level, and mixed waste. These waste streams will be managed within the CERCLA Area of Contamination (AOC) associated with the corresponding remedial actions. The AOC for TSF-06 and TSF-26 sites for waste management purposes is shown in Figure 5-2.

All waste streams generated as a result of the remedial action will be managed in accordance with the Waste Management Plan for TAN, OU 1-10 Group 1 Sites Remedial Action (INEEL 2000b). Under this plan, waste will be disposed of at (1) a permitted disposal site, (2) a site with disposal authorization from DOE Headquarters (e.g. RWMC), (3) a site operating under Health Department regulations (e.g. CFA landfill), or (4) a disposal site expressly designated to accept CERCLA waste (e.g. ICDF). DOE will demonstrate that: (1) the waste meets the acceptance criteria of the disposal site, (2) the disposal site is properly permitted, designated, or operates under DOE or Health Department regulations, and (3) the disposal site has no violations of its permit (if permitted). The CFA landfill and the RWMC disposal facilities operate under separate legal authorities, and if releases occur at either facility and are not adequately addressed through the operating authorities, these releases may be subject to enforcement under the FFA/CO.

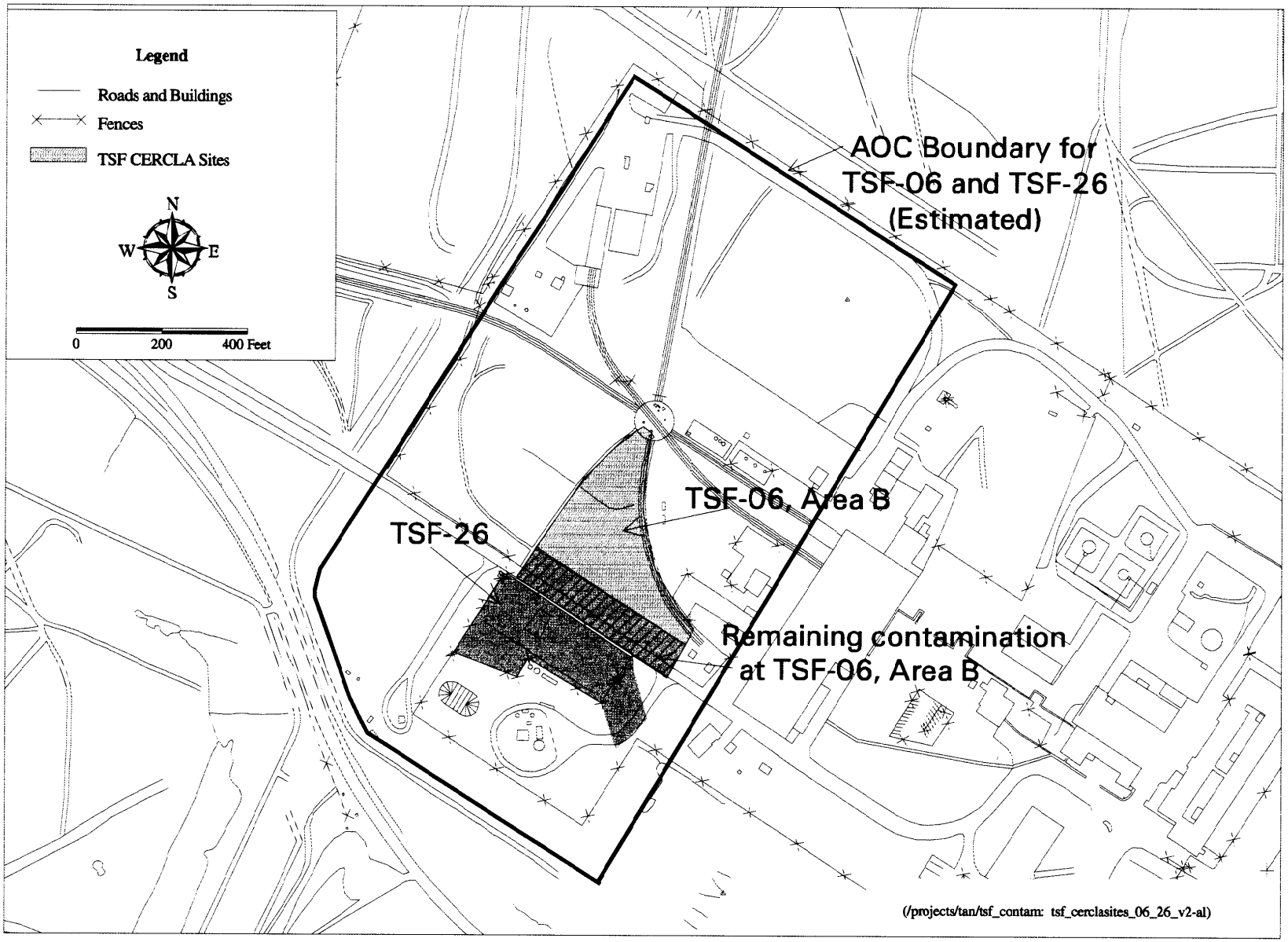


Figure 5-2. Area of Contamination for TSF-06, Area B and TSF-26 Group 1 Remedial Action.

In addition, waste generated during the remedial investigation, otherwise known as investigation derived waste (IDW), will be managed per the letter from Mr. Michael A. Bussell (EPA Region 10 Director for the Office of Waste and Chemicals Management) to Mr. David L. Wessman (TSCA Compliance Manager for the United States Department of Energy Idaho Operations Office) dated January 4, 2000, "The EPA is allowing continued storage of 21 cargo containers of radioactively contaminated IDW containing PCBs. These cargo containers may be stored in the TAN LOFT Building 624, until such time that the waste can be sorted, segregated, and properly disposed." Once the waste has been sorted and segregated the non-PCB waste may be incinerated at WERF and the IDW that contains PCBs and listed waste may be stored in accordance with the V-Tanks ARARs identified in the ROD within the boundaries of the INEEL until final treatment/disposal location is identified.

5.2.10 Earthwork

The earthwork on this project will be defined as:

- Excavation and transportation of radionuclide-contaminated soils from the Soil Contamination Area South of the Turntable and the PM-2A Tanks to the proposed ICDF or another disposal facility either on or off the INEEL
- Excavation, hauling, and placement of backfill material
- Grading and reclamation seeding of the former excavations.

All earthwork will be performed in accordance with Specification 02200, provided in Appendix B, and the project design drawings in Appendix A of this document.

5.2.11 Post-Excavation Sampling

Postremediation verification sampling will be performed in accordance with the *Field Sampling Plan for Remedial Action Sampling and Field Screening of Selected Sites at Waste Area Group 1, Operable Unit 1-10* (DOE-ID 2000b) to ensure all contamination exceeding FRGs has been removed.

5.2.12 Reclamation Seeding

Upon completion of all earthwork activities, reclamation seeding will take place on the backfilled excavations, lay down areas, and on all areas affected by material borrowing, stockpiling, etc. The seeding and mulching will be performed in accordance with the requirements identified in Specification 02930, provided in Appendix B of this document.

5.2.13 Institutional Controls

Field activities conclude with the establishment of institutional controls, as presented in the WAG 1 institutional controls plan (DOE-ID 2000a). Institutional controls for WAG 1 will be included in the facility master plan.

Following remediation, administrative controls will be continued, including lease and property transfer land use restrictions and access restrictions according to the WAG 1 institutional controls plan (DOE-ID 2000a).

5.2.14 Demobilization

After the remedial action activities have been satisfactorily completed, and all equipment properly decontaminated, the subcontractor will demobilize from the site. The office trailer and equipment will be removed from the site. Decontamination pads and temporary fencings erected by the subcontractor will be removed and packaged for disposal, as appropriate.

5.3 Inspections

Upon completion of remedial action construction activities, standard prefinal and final inspections will be performed at each site at the discretion of the Agency project managers or designees. Periodic inspections can occur at any time during remedial activities. The inspections will be conducted to finalize all project work elements. The inspections will establish compliance with the remedial design, with the activities outlined in the remedial action work plan, and with all requirements indicated.

5.3.1 Prefinal Inspection.

The Agency project managers or their designees will conduct the prefinal inspection at the completion of the remedial action construction for the Group 1 sites. A checklist used to document the prefinal inspection will be developed and will be implemented upon approval by the Agencies. Separate prefinal inspections may be scheduled to address the Group 1 sites based on the schedule for performing the remedial action and with concurrence of the Agency project managers. The DOE-ID will notify the Agencies approximately two weeks prior to the prefinal inspection date.

The prefinal inspection will determine the status of construction/remediation activities, including outstanding construction requirements and actions necessary to resolve any issues identified. All of the outstanding construction requirements, along with the actions required to resolve those items, will be identified and approved by the Agencies during the prefinal inspection. The prefinal inspection checklist will be used to document any unresolved or open items and the required actions for resolution or completion. Results of the prefinal inspection will be documented in a prefinal inspection report, which will contain the following elements:

- The names of all inspection participants
- Specific project elements that were inspected
- Completed prefinal inspection checklist documenting the performance of the inspection and all inspection findings
- Corrective actions to be taken to correct deficiencies and open items identified in the inspections, including the required corrective action, acceptance criteria or standards, and planned dates for completion of the actions
- Date of final inspection (if required).

The prefinal inspection report will be issued as a letter report to document the process and results of the prefinal inspection and to indicate that the final remediation goals have been met. If the prefinal inspection does not result in any significant open items that require corrective action, the inspection may be considered a final inspection and the results documented in a final inspection report as described in the following section. The prefinal inspection report will not be revised/finalized. The inspection will be finalized in the Group 1 final inspection report documenting the prefinal and final inspection process. The completed prefinal inspection checklist will be included as an appendix to the prefinal inspection report. Submittal of the prefinal inspection report and the respective targeted schedule are identified in this work plan.

5.3.2 Final Inspection

A final inspection will be scheduled and conducted at the completion of all OU 1-10 Group 1 remedial actions. The need for a final inspection will be determined by the Agency project managers based on the results of the prefinal inspection(s). The final inspection will focus on closure verification of open items from the prefinal inspection(s) and will be used to confirm and document that the final remediation goals have been met.

A final inspection report will be prepared following the completion of the remedial action and prefinal and final inspection process for all Group 1 sites. The report will be submitted to the Agencies for review as a secondary document. The final inspection report will include:

- Identification of the work defined in this Group 1 Sites RD/RAWP and certification that the work was performed and that final remediation goals have been met
- Explanation of any modifications to the Group 1 sites RD/RAWP
- Any modifications made to the remedial design during the Group 1 sites remedial action phase, including the purpose of the performed modifications and results of the modifications
- Problems encountered during the Group 1 sites remedial action and resolutions to these problems
- Any outstanding items from the prefinal inspection checklist that were identified and described; in responding to comments received, the prefinal inspection checklist will not be revised, but rather will be finalized in the context of the final inspection report
- An O&M plan update, if necessary
- As-built drawings showing final contours (as applicable).

The Group 1 final inspection report, finalized through formal Agency review and comment resolution, will be incorporated into the OU 1-10 remedial action report, a primary document which will be submitted after OU 1-10 Group 2 remedial action and inspection completion. In accordance with FFA/CO Section 12.2, the draft OU 1-10 remedial action report will be submitted within 60 days after the final inspection for the OU 1-10 Group 2 sites. Requirements for the OU 1-10 remedial action report will be addressed in the OU 1-10 Group 2 RD/RAWP.

5.4 Supporting Documents

The following sections provide a brief description of documents or procedures associated with activities to be conducted at the OU 1-10 remedial sites being addressed in this work plan.

5.4.1 Operation and Maintenance Plan

The O&M plan (DOE-ID 2000c) covers requirements for on-going maintenance and inspection and environmental monitoring for OU 1-10 sites following the completion of remedial action. The plan also references and interfaces with the activities covered in the WAG 1 institutional control plan (DOE-ID 2000a) and further addresses requirements for five-year reviews. The O&M plan is a living document, revised as necessary to incorporate changes and additions identified during the implementation of the plan.

5.4.2 Institutional Controls Plan

The WAG 1 institutional control plan (DOE-ID 2000a) provides institutional control requirements for all WAG 1 sites requiring institutional controls. The plan also contains inspection items for the annual inspections. The plan is a living document, revised as necessary to incorporate changes and additions identified during the implementation and subsequent five-year reviews.

5.4.3 Decontamination Plan

Equipment decontamination will be conducted at the Soil Contamination Area South of the Turntable and the PM-2A Tanks, where radionuclide contaminated soils will be excavated. Prior to completing the removal of contaminated soil, all tools and equipment that were in contact with contaminated soils will be decontaminated.

Specific decontamination procedures will be performed for radiological contaminants on equipment used during remedial activities. The Soil Contamination Area South of the Turntable and PM-2A Tanks may require decontamination for radiological and F001-listed contaminants.

Decontamination operations will be performed in accordance with Environmental Restoration Technical Procedure -52 (formerly Standard Operating Procedure -11.5), "Field Decontamination of Sampling Equipment,"(INEEL 1999) with the following exception:

- Isopropyl alcohol (isopropanol) will not be used during decontamination to avoid generation of a hazardous waste.

Dry decontamination procedures will be used at the beginning of the decontamination effort. If additional wet decontamination is necessary, the equipment will be driven or placed onto a clean decontamination pad and/or plastic, such as rubber matting, for this activity. If this is not successful, equipment may be decontaminated by using a high-pressure water spray from a portable unit. All equipment will be surveyed, and visually inspected to ensure all source contamination has been removed. If additional contamination is still evident, additional decontamination efforts will be conducted until the equipment is free releasable and is clean. The equipment will remain in the areas where remediation is occurring until it is adequately decontaminated, as verified by field radiation surveys performed by the radiological control technician.

The following equipment is required for decontamination:

- Decontamination pads or plastic large enough for any equipment used in the contaminated areas

- Brooms, wire brushes, putty knives, and other small equipment for removing radionuclide-contamination through dry methods

- Portable low volume, high-pressure water spray units (this equipment would only be used if dry decontamination was ineffective).

Management of wastes generated during decontamination efforts will remain within the area of contamination (AOC) for temporary storage until final waste disposition. Tools used for equipment decontamination (brushes, etc.) will be decontaminated, surveyed for radiological contamination, and released for reuse.

5.4.4 Waste Management Plan

The OU 1-10 waste management plan (INEEL 2000b) describes waste management activities for the OU 1-10 Group 1 sites. The plan identifies the waste streams that will be generated during the remedial actions and details the plans for waste management, minimization, and disposition.

The following waste streams are expected to be generated as a result of the remedial action activities:

- Personal protective equipment
- Decontamination water
- Fence posts, stakes, and wire
- Soil and weeds
- Noncontaminated project waste.

Ultimate disposition of these waste streams will depend on whether they are contaminated with low-level radiological contaminants, petroleum contaminants, or a mixture of any of the above. Note that a more detailed list is provided in the waste management plan.

5.4.5 Remedial Action Field Sampling Plan

The remedial action field sampling plan (DOE-ID 2000b) has been prepared for the specific tasks of conducting confirmation sampling at TSF-26 and TSF-06. This document is a living document and may be updated as conditions dictate. This plan covers the following items:

- Task-site responsibility
- Personnel training
- Sampling objectives
- Sampling locations and frequency
- Sampling procedures
- Sampling equipment

5.4.6 Health and Safety Plan

A site-specific OU 1-10 HASP is being prepared specifically for the tasks and conditions to be encountered on this project. The document is a living document and may be updated as conditions dictate. This plan covers the following items:

- Task-site responsibility
- Personnel training
- Occupational medical program and medical surveillance

- Safe work practices
- Site control and security
- Hazard evaluation
- Personal protective equipment
- Decontamination and radiation control
- Emergency response plan for the task sites.

5.4.7 Spill Prevention/Response Program

Any inadvertent spill or release of potentially hazardous materials will be subject to the substantive requirements contained in the *Emergency Plan/RCRA Contingency Plan* (INEEL 1998b) for the TAN area. Handling of the materials and/or substance will be in accordance with the recommendations of the applicable material safety data sheets, which will be located onsite. In the event of a spill, the emergency response plan (see Section 11 of the project HASP) will be activated. All materials/substances on the work site will be stored in accordance with the applicable regulations and will be stored in approved containers.

6. FIVE-YEAR REVIEW

In accordance with the National Contingency Plan for sites where contamination is left in place above health-based levels, a review will be conducted within five years from the initiation of construction activities at OU 1-10 to ensure that the remedy is still effective in protecting human health and the environment. Subsequent five-year reviews will be completed within five years of the previous review. This will also be used to assess the need for future long-term environmental monitoring and administrative/institutional controls.

All sites with contamination remaining above unrestricted land use concentrations will require an evaluation during the first five-year review. For "No Further Action" sites identified in the ROD, land use assumptions and restrictions will be reviewed as part of the five-year review. The possibility exists that contaminated environmental media not identified by the INEEL FFA/CO or in this comprehensive investigation will be discovered in the future as a result of routine operations, maintenance activities, D&D, and review of previous D&D activities at TAN. These will be addressed using the process for new site inclusion defined in the FFA/CO and will be remediated pursuant to the RAOs and the FRGs identified in the ROD. Five-year reviews will also ensure that any changes in the physical configuration of any TAN facility or site where there is suspicion of a release of hazardous or radioactive substances (such as D&D) will be managed to achieve remediation goals established in the ROD.

The Agencies agreed that "No Action" would be taken at the 76 additional sites described in the ROD. These "No Action" sites will not require five-year reviews and are available for unrestricted land use.

The WAG 1 institutional control plan (DOE-ID 2000a) and OU 1-10 O&M plan (DOE-ID 2000c) identify the inspections during the first five years after the remedial action. Inspection details and inspection checklists are provided in these plans. After the first five-year review, the Agencies may revise the inspection frequency. Further requirements for five-year reviews will be developed and addressed in a future revision to the OU 1-10 O&M plan (DOE-ID 2000c).

7. REFERENCES

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